

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

ROSE HILLS,	§	
Plaintiff	§	
	§	
v.	§	CIVIL ACTION NO. 6:18-cv-301-ADA
	§	
SAM’S EAST, INC., SAM’S CLUB, and	§	
WAL-MART, INC., formerly known as	§	
WAL-MART STORES, INC.,	§	
Defendants	§	

PLAINTIFF ROSE HILL’S EXPERT DISCLOSURES

To: Defendants, Sam’s East Inc., Sam’s Club, and Wal-Mart, Inc., formerly known as Wal-Mart Stores, Inc., by and through their attorneys of record Brett H. Payne and Katie McLean, WALTERS, BALIDO & CRAIN, L.L.P., 9020 N. Capital of Texas Highway, Building II, Suite 225, Austin, Texas 78759

Plaintiff, ROSE HILLS makes these expert disclosures as required by Federal Rule of Civil Procedure 26 (a)(2).

**I.
A. IDENTITY OF EXPERTS**

1. Plaintiff may use the following persons at trial to present evidence under Federal Rule of Evidence 702, 703, or 705:

a. Retained Expert Witnesses

1) Jason T. English, M.S., CSP, P.E.
543 William D Fitch Parkway
Suite 112
College Stations, TX 77845
(979)431-0702

2) Dr. Hector A. Miranda-Grajales, MD, FAAPM&R, CLCP
4201 Bee Caves Rd.
Suite C-213
West Lake Hills, Texas 78746

(512) 960-4717

b. Non-Retained Expert Witnesses

Pain Specialists of Austin

Gary L. Heath, MD

Including its physicians, nurses, employees, staff, and records custodians

1210 South 31st Street

Temple, Texas 76504

(512) 485-7200

Baylor Scott & White Health Medical Center & Clinics—Temple

Jason Noel Collins, MD

Carla Christine Khalaf McStay, MD

Garrett Fitzpatrick Frantz, MD

Dorian Frederick Drigalla, MD

David Harold Uhrbrock, MD

Including its physicians, nurses, employees, staff, and records custodians

2401 South 31st Street

Temple, Texas 76508

(254) 724-2111

Baylor Scott & White Health Medical Center & Clinics—Temple Westfield Clinic

Jennifer Konvicka Flory, MD

Including its physicians, nurses, employees, staff, and records custodians

7556 Honeysuckle Road

Temple, Texas 76502

(254) 742-7400

Baylor Scott & White Health – Scott & White Pavilion

Christopher Jason Burnett, MD

Jennifer Konvicka Flory, MD

Christopher Mark Sirianni, MD

Elwood Fray Williams, MD

Christina Maria Cabret-Aymat, MD

Bret Wardle, PT

Including its physicians, nurses, employees, staff, and records custodians

1815 South 31st Street

Temple, Texas 76504

(254) 724-2111

Comprehensive Injury Treatment Services

Patrick McHorse, DC

Ronald M. George, DC

Chris Price, DC

Including its chiropractors, physicians, physical therapists, nurses, nurse practitioners, employees, staff, and records custodians
1602 West Avenue A, Suite B
Temple, Texas 76504
(254) 899-2225

B. INFORMATION FROM RETAINED OR SPECIALLY EMPLOYED EXPERTS

2. The following persons are those whom Plaintiff has retained or specially employed to provide expert testimony or whose duties as Plaintiff's employee regularly involve giving expert testimony:

Jason T. English, M.S., CSP, P.E.

Dr. Hector Miranda-Grajales, MD, FAAPM&R, CLCP

3. Plaintiff attaches a written report for each retained or specially employed expert. Each report is prepared and signed by the expert and contains the following:

- i. A complete statement of all opinions the expert will express and the basis and reasons for them.
- ii. The facts or data considered by the expert in forming the opinions.
- iii. Any exhibits that will be used to summarize or support the opinions.
- iv. A curriculum vitae, résumé, or other listing of each expert's qualifications.
- v. A list of all publications authored by the expert in the previous ten years.
- vi. A list of all other cases in which the expert testified as an expert at trial or by deposition during the previous four years.
- vii. A statement of the compensation to be paid for the study and testimony in the case.

C. INFORMATION FROM NONRETAINED EXPERTS

4. The following persons are those who are not required to provide a written report: physicians, nurses, employees, staff, and records custodians for:

Baylor Scott & White Health Medical Center & Clinics- Temple;
Baylor Scott & White Health Medical Center & Clinics- Temple Westfield Clinic;
Baylor Scott & White Health Medical Center & Clinics- Scott & White Pavilion
Comprehensive Injury Treatment Services
Pain Specialists of Austin.

5. Pursuant to FED. R. CIV. P. 26(a)(2)(C) for the above identified nonretained experts Plaintiff identifies the following:

- a. The subject matter on which the expert is expected to present evidence.
- b. A summary of the facts and opinions on which the expert is expected to testify.

The experts listed above who are health care providers may testify about the health care provided to Plaintiff and other subjects or issues within their expertise, to include but not limited to:

- (a) the injuries Plaintiff sustained as a result of the incident made the basis of this lawsuit;
- (b) that the incident was a cause of Plaintiff's injuries;
- (c) their diagnoses and prognoses of Plaintiff's condition;
- (d) that Plaintiff's injuries were caused or aggravated by the incident made the basis of this lawsuit;
- (e) the treatment they provided to Plaintiff;
- (f) that Plaintiff suffered pain and physical and mental impairment in the past;
- (g) that Plaintiff may suffer pain and physical and mental impairment in the future;
- (h) that the services provided to Plaintiff were medically necessary;
- (i) that the charges for the medical services were reasonable at the time and place they were provided;
- (j) that Plaintiff may or will require medical treatment in the future; and
- (k) the reasonable charges for any future necessary medical services.

For a further explanation of the opinions of the nonretained experts identified above see the provided medical records.

Plaintiff reserves the right to elicit expert testimony from individuals designated by the Defendant and any persons listed as persons with knowledge of relevant facts should they be so qualified.

Respectfully Submitted,

THE CARLSON LAW FIRM, P.C.
2010 SW HK Dodgen Loop, Suite 201
Temple, Texas 76504
(254) 771-5688
FAX (254) 771-0655

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pkoelsch@carlsonattorneys.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the above and foregoing instrument has been served upon all known counsel of record by email and certified mail on this the 18th day of July, 2019.

VIA EMAIL: katie.sacra@wbclawfirm.com / paynevfax@wbclawfirm.com

VIA CMRRR: 91 7199 9991 7035 3568 0296

Brett Payne / Katie McLean

Walters, Balido & Crain, L.L.P.

9020 N. Capital of Texas Highway

Building II, Suite 225

Austin, Texas 78759

/s/ Julie L. Peschel

Julie L. Peschel